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March 12, 2020

VIA ECF

The Honorable Paul G. Gardephe United States District Judge Southern District of New York Thurgood Marshall United States Courthouse 40 Foley Square, Room 2204 New York, New York 10007

> Re: <u>United States v. Christina Garcia</u> 19 Cr. 789 (PGG)

Dear Judge Gardephe:

Defense counsel respectfully submits this letter to request a temporary modification of Ms. Garcia's travel restrictions. This letter is submitted without any objections from the AUSA or Pretrial Services to this application.

Ms. Garcia seeks a temporary modification of her travel restrictions to permit travel to Florida on April 1, 2020 and return on April 10, 2020. The purpose of her travel is to visit her mother who resides in Orlando Florida. Ms. Garcia's mother was a cosigner for the purpose of moral suasion for Ms. Garcia and was interviewed by the Government before cosigning Ms. Garcia's bond. Additionally, counsel has emailed both Pretrial Services and the AUSA with Ms. Garcia's mother's name and address in connection with this request.

Thank you in advance for your consideration in this matter.

Respectfully submitted,

/s/

Carlos M. Santiago, Jr. Attorney for Ms. Garcia

cc: all parties (via ECF)

MEMO ENDORSED

The Application is granted.

SO ÖRDERED

Paul G. Gardephe, U.S.D.J.

Dated: Mark 16, 2020